

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PROMOS TECHNOLOGIES, INC.,)	
)	
Plaintiff,)	C.A. No. 06-788-JJF
)	
v.)	
)	
FREESCALE SEMICONDUCTOR, INC.,)	
)	
Defendant.)	

**NOTICE OF RE-DEPOSITION OF
DEFENDANT FREESCALE SEMICONDUCTOR, INC.
PURSUANT TO RULE 30(b)(6)**

PLEASE TAKE NOTICE that Plaintiff ProMOS Technologies, Inc., will re-take the deposition of Defendant Freescale Semiconductor, Inc. ("Freescale"), pursuant to Fed. R. Civ. P. 30(b)(6) and the Court's December 20, 2007 Order, on the topics set forth in Exhibit A hereto, beginning at 9:30 a.m. on January 7, 2008, or on such other date as counsel may mutually agree, at the offices of Ashby & Geddes, 500 Delaware Avenue, 8th Floor, Wilmington, DE 19899. The deposition will be recorded stenographically and by videotape.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Freescale shall designate one or more officers, directors, managing agents, or other individuals to testify on its behalf as to matters known or reasonably known to Freescale regarding the topics set forth below. If more than one person is so designated, Freescale shall set forth in advance of the deposition the topic(s) or area(s) on which each designee will provide testimony.

Definitions And Instructions

1. The term "Freescale" shall mean Freescale Semiconductor, Inc., and any parent, subsidiaries, divisions, affiliates, and/or branches of the foregoing entities, any wholly or partly owned entities of the foregoing, any and all predecessors and successors thereof, and any entities

acting or purporting to act for or on behalf of, or who are subject to the direction or control of, any of the foregoing entities, including agents, employees, officers, directors, attorneys, consultants, contractors, subcontractors and representatives.

2. The term “document” will have the same meaning as that term is given in the “Definitions” section of ProMOS Technology Inc.’s First Request for Production of Documents served April 12, 2007.

3. The term Freescale Product(s) shall refer to the products and cores identified in Exhibit 1 hereto.

Topics For Examination At Deposition

1. Documents maintained by Freescale that evidence the design and/or features of cache memories contained in Freescale Products.

2. Documents maintained by Freescale that evidence how cache memories are accessed in and/or used in Freescale Products.

3. Documents maintained by Freescale that evidence the design and/or features of cache memory controllers contained in Freescale Products.

4. Features associated with cache memories contained in Freescale Products.

5. Features associated with cache memory controllers contained in Freescale Products.

6. Any website maintained by Freescale and any information set forth therein that discloses features associated with cache memories or cache memory controllers contained in Freescale Products.

ASHBY & GEDDES

/s/ John G. Day

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Dated: December 28, 2007

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EXHIBIT 1

603e
e200
e200z1
e200z0
e200z6
e300
e300c2
e500
e500v2
e600
dual e600
G2
G4
8xx
Coldfire v2
Coldfire v3
Coldfire v4
Coldfire v4e
Coldfire v5
MC68060
ARM 920T
ARM926EJ-S
ARM1136JF-S
800 MHz/1GHz
StarCore SC3400
DSP extended core
800 MHz/1GHz
StarCore SC3400
DSP core
SC1400
DSP 56300

any products that
incorporate any of
the foregoing cores

MPC7400
MPC7450
MPC604
MPC604e
MPC604ev
MPC603
MPC603e
MPC603ev
MPC601
MPC620
MPC750
MPC740
MPC755

MPC2605
K2
8569
8526
MPC5200
MPC5200B
MPC5510
MPC5553
MPC5554
MPC5561
MPC5565
MPC5566
MPC5567
MPC7410
MPC7445
MPC7455
MPC7447
MPC7457
MPC7447A
MPC7448
MPC823
MPC823E
MPC850
MPC852T
MPC853T
MPC855T
MPC857DSL
MPC857T
MPC859DSL
MPC859T
MPC860
MPC860P
MPC862
MPC866
MPC870
MPC875
MPC880
MPC885
MPC8247
MPC8248
MPC8250
MPC8255
MPC8260
MPC8264
MPC8265
MPC8266
MPC8270
MPC8271
MPC8272
MPC8275
MPC8280
MPC8313
MPC8313E
MPC8321

MPC8321E
MPC8323
MPC8323E
MPC8343E
MPC8347E
MPC8349E
MPC8358E
MPC8360E
MPC8533E
MPC8540
MPC8541E
MPC8543E
MPC8544E
MPC8545E
MPC8547E
MPC8548E
MPC8555E
MPC8560
MPC8567E
MPC8568E
MPC8641
MPC8641D
MCF5206e
MCF5207
MCF5208
MCF5211
MCF5212
MCF5213
MCF5214
MCF5216
MCF5232
MCF5233
MCF5234
MCF5235
MCF5249
MCF5270
MCF5271
MCF5272
MCF5274
MCF5274L
MCF5275
MCF5275L
MCF5280
MCF5281
MCF5282
MCF5307
MCF5327
MCF5328
MCF5329
MCF5372
MCF5372L
MCF5373

MCF5373L
MCF5407
MCF5470
MCF5471
MCF5472
MCF5473
MCF5474
MCF5475
MCF5480
MCF5481
MCF5482
MCF5483
MCF5484
MCF5485
MC68060
MC68LC060
MC68EC060
i.MX1
(MC9328MX1)
i.MX21
i.MX21S
i.MX27
i.MX31
i.MX31L
i.MXL
i.MXS
MSC8144
MSC8144E
MSC8144EC
MSC7110
MSC7112
MSC7113
MSC7115
MSC7116
MSC7118
MSC7119
MSC7120
DSP56301
DSP56311
DSP56321
DSP56L307